

# EXHIBIT “D”

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

-----X

CHARLENE TALARICO, individually and on behalf of a  
class of all others similarly situated;;

PLAINTIFFS,

-against-

Index No.:

00909(JPO)

THE PORT AUTHORITY OF NEW YORK AND NEW JERSEY,

DEFENDANTS.

-----X

DATE: August 14, 2020

TIME: 10:14 A.M.

EXAMINATION BEFORE TRIAL of the PLAINTIFF,  
CHARLENE TALARICO, taken by the DEFENDANTS, pursuant  
to a COURT ORDER, held at the offices of The Port  
Authority of NY & NJ 10006, before Danielle S.  
Battle, a Notary Public of the State of New York.

1 Port Authority?

2 A. I started on January 5, 2009.

3 Q. And your current title with the Port  
4 Authority is what?

5 A. I'm a C21, I'm not quite sure senior  
6 administrator secretary, maybe, I'm not sure.

7 Q. And where is your office located  
8 currently?

9 A. I work in the office of the chief of  
10 security otherwise known as police head quarters.

11 Q. And is that at 241 Erie Street in Jersey  
12 City?

13 A. PATC, yup.

14 Q. And who is your immediate supervisor at  
15 the CSO's office?

16 A. I guess you want to say Waylon Munson  
17 [sic].

18 Q. And how long have you been working at the  
19 CSO offices at PATC?

20 A. Well, they pushed me out of work at the  
21 Lincoln Tunnel from June until October so, I think  
22 the date I went back was October 12, 2016.

23 MR. SOTO: Can we just get a clarification  
24 of what PATC is for the record?

25 Q. Ms. Talarico, do you know what the term

1 So August 4, 2016 was your first day back to work  
2 since June of 2016?

3 A. Yes, they forced me out, yes.

4 Q. I just want to take this one step at a  
5 time. So when you say they forced you out, was that  
6 in June of 2016 that you're referring to?

7 A. Yes.

8 Q. And when you say they forced you out in  
9 June of 2016, what are you referring to?

10 A. They forced me out.

11 Q. Who is they?

12 A. Jerry Lindenmeir, L-I-N-D-E-N-M-E-I-E-R,  
13 something like that. They forced -- well, you want  
14 the sorry of what happened because it's more than a  
15 yes or no?

16 Q. Well, we're going to take it one step at a  
17 time, let's just start with who is they?

18 A. Well, they is Jerry Lindenmeier, Diannae  
19 Ehler, Rebecca Krulenburg [sic] I believe was  
20 involved. I think what's his face that works here  
21 was involved, and the people -- Dr. Fisher was  
22 involved, Robin Martin was involved and the  
23 contracted psychologist in New York, what the heck  
24 is his name, Novich [sic] there was a group of  
25 people that were involved that they decided to have

1 -- let me get it in the right order, to the chief  
2 security office which at the time was called public  
3 safety then that was temporary, I was only there for  
4 a few months because the person came back to work.  
5 Then I had to go back to Staten Island, should I  
6 keep going?

7 Q. Please?

8 A. Then I went from Staten Island to another  
9 temporary at the George Washington bridge. I'm not  
10 sure if I have them in the right order, it could  
11 have been PATC first then the head quarters, no, I  
12 think -- then the George and then I went back to  
13 Staten Island, I'm pretty sure, this is the best I  
14 can remember, you know I've been through a lot.

15 Q. I'm only asking for your best  
16 recollection?

17 A. And then I went and took a lateral  
18 position to the Lincoln Tunnel which was a permanent  
19 position.

20 Q. Approximately when was that lateral switch  
21 that you took to the Lincoln Tunnel?

22 A. Oh, I just had that date, I want to say it  
23 was like in November.

24 MR. SOTO: Do you want her to leave that  
25 blank for her to fill that in?

1 everybody didn't love you that definitely happens in  
2 the Port Authority unfortunately. But as far as  
3 having any of these big issues, anonymous notes,  
4 people spiting in my food, and all that no, it all  
5 happened at the Lincoln.

6 Q. And so you were telling us about the first  
7 time that the Port had sent you to OMS and that was  
8 based on things that were going on between you and  
9 other individuals at the Lincoln Tunnel?

10 A. Actually, I don't know that I agree with  
11 that analysis of what had happened.

12 Q. So please tell me?

13 A. Well, steven Palatano was not happy that I  
14 sent a letter to Patrick Floyd, so Steven Palatano  
15 had myself and Donna Leborn in a room, in a meeting  
16 Steven Palatano proceeded to pull his chair within a  
17 millimeter of my nose and point his finger at my  
18 face and told me if I don't go along with his  
19 program he's calling HR and I'm out of here, which  
20 to me is threatening my job. And then Donna Leborn  
21 [sic] took notes of the meeting okay, I asked for a  
22 copy of the notes and she said oh, I threw them out  
23 and I said well send me a copy of the notes you sent  
24 to Steven Patalano, oh, I deleted it. The note the  
25 minutes from that meeting that Steven Palatano wrote

1 or had written, do not reflect anything that  
2 occurred during that meeting and when I asked Donna  
3 Leborn about Steve getting in my face and scaring me  
4 okay, how about she says, I don't recall. So,  
5 that's why I went because I went and wrote another  
6 letter saying what he did to me and that's why they  
7 sent me to medical. That had nothing to do with how  
8 I was getting along, they didn't care. I always did  
9 my work, my work was impeccable, impeccable, I saved  
10 the Port Authority thousands and thousands of  
11 dollars of needless overtime. I did my job exactly  
12 the way I was told to do it, I never missed any of  
13 my work, no one else ever did any of my work but the  
14 problem was, the people that was losing the overtime  
15 from sitting around weren't happy. The TBA's they  
16 started harassing me to an extent that should been  
17 allowed. The girls in the office was mad because  
18 they took work away from them and gave it to me,  
19 which makes no sense to me but that's what they do.

20 Q. So the first time that you were sent to PA  
21 medical --

22 A. I was sent to Journal Square to see Dr.  
23 Francis and Dr. Francis opens up her notes and says  
24 Charlene, you don't even have a file in medical. I  
25 know Dr. Francis, I've never been here. Charlene

1     why are you here, well, because they're forcing me  
2     here because I keep begging for them to get me some  
3     help and have people stop abusing me and so they  
4     decided to send me here.

5           Q.     And was that -- how many times did you see  
6     Dr. Francis --

7           A.     Once.

8           Q.     Please let me finish -- so that you had  
9     one trip to PA medical that first time and one  
10    meeting with Dr. Francis and --

11          A.     At Journal Square.

12          Q.     At Journal Square, and then did you return  
13    back to work after that?

14          A.     Absolutely, I wasn't even out of work,  
15    they just made me an appointment to go there, I was  
16    working that whole time.

17          Q.     And did there come a point in time when  
18    somebody at the agency referred you back to PA  
19    medical for a second time?

20          A.     Yeah, years later when Jerry Lindenmeier  
21    came to the Lincoln Tunnel to make my life a  
22    living -- oh, no -- yes, because that was after  
23    Steve to make my life a living hell, yes. Jerry  
24    sent me, I don't know if he sent me there two or  
25    three times, I'm not quite sure but it all revolved



1 was supposed to go back to work on August 4, 2016  
2 because I was very concerned and said I don't want  
3 one day without pay. So August 4, 2016, I was  
4 supposed to go back to work. August 3, 2016, I met  
5 with that contract guy Novich, that guy up on Park  
6 Avenue who while I was out and I do have documented  
7 anxiety, they rearranged my cubicle which would have  
8 exacerbated my anxiety, going against Americans with  
9 Disabilities, I spoke with Dr. Novich --

10 Q. Ms. Talarico, will have an opportunity --

11 A. This has to do with going back to work.

12 Q. I know, but you didn't realize that  
13 anybody changed your cubicle --

14 A. Oh, yeah, I knew months before, and I was  
15 writing to HR all the time, how can you do this,  
16 absolutely. So, I go to Dr. Novich -- I didn't go  
17 because I wanna, I have to and there were times that  
18 I had to visit help him in between while I was home,  
19 you know to check in for no apparent reason. On  
20 August 3rd I was with him and he said he talked to  
21 my personal therapist that is Depice and that Gary  
22 told him that the workspace was fine. Well, I  
23 called up Gary from Doctor -- well, I don't call him  
24 a Doctor, Novich's office, I called up Gary and  
25 Gary said he never said any such thing and I told

1 that they told you on October -- I'm sorry, on  
2 August third the day before?

3 A. I might have known before. All I can tell  
4 you is that on August third I went to see Novich. I  
5 might have already known I had to go back on the  
6 fourth, but I had to see him on the third because he  
7 would have to clear me to go back work on the  
8 fourth. So I have no idea how I found out prior to,  
9 I'd be lying maybe Rebecca called me, I don't know.

10 Q. You don't know, you don't know, that's  
11 fine. But you do know that you went back to work on  
12 August 4, 2016, correct?

13 A. Yes.

14 Q. And what time did you go back to work that  
15 day?

16 A. Approximately I was normally working at  
17 7:30, I normally get to work earlier so somewhere in  
18 between seven and 7:30 I would guesstimate.

19 Q. And what happened when you arrived?

20 A. Oh, Jerry Lindenmeier and Diannae Ehler  
21 are waiting for me which never happens. Jerry  
22 Lindenmeier usually didn't show up to work until  
23 late and Diannae Ehler was never there in the  
24 morning when I got there.

25 Q. And where were they waiting?

1           A.     Then we go into Jerry's office and I'm  
2     very nervous and very upset and so when you walk  
3     into Jerry's office, as soon as you get into office  
4     to the left, there's a chair with a table. I  
5     immediately sat down in that chair because I didn't  
6     know what else to do because I was so upset they  
7     were screaming at me. And then Diannae was in front  
8     of me on one leg, Jerry was over here and I was  
9     sitting in the chair and I had my phone over here  
10    and I put it on the table and they just continued to  
11    keep screaming at me.

12          Q.     Do you recall what it was that they were  
13    screaming?

14          A.     They were screaming at me, you better not  
15    be taping this, I only wish I was. I wish to God I  
16    was taped them because we wouldn't even be here,  
17    this would have been done years ago. Screaming at  
18    me, you better not be taping this, you better not be  
19    taping this.

20          Q.     And what happened next?

21          A.     Diannae Ehler from over here reaches all  
22    the way across goes to rip the phone out of my hand  
23    my hand goes up in the air and I was just like kind  
24    of in shock and I get up and I said that's it, you  
25    assaulted me I'm going downstairs and I went

1 downstairs to the police.

2 Q. And did either Jerry or Diannae say  
3 anything when you told them you were going  
4 downstairs to the police?

5 A. Not that I recall.

6 Q. Did they attempt to stop you at all from  
7 going?

8 A. No that I -- in that instant, no.

9 Q. And where downstairs did you go?

10 A. I went downstairs you go out the office  
11 there were stairs right there. I went downstairs  
12 walked into the captains office who I did not know  
13 because it was a new captain since I was out, it was  
14 Captain Gonzalez, Emilio Gonzalez [sic] and so he  
15 was sitting there, he didn't know who I was, I  
16 didn't know who he was, and I told him I was just  
17 assaulted and I want to press criminal charges.

18 Q. And what the captain say?

19 A. He sent me to Sergeant Flemming and then  
20 Sergeant Flemming I thought I was put in criminal  
21 charges but that's not what happened. And then  
22 Jerry Lindenmeier shows up and then all of these  
23 other cops show up and everybody is yelling at me  
24 and then the captain comes back and it's not his  
25 decision and he says, I'm sorry, Ms. Talarico this

1 this doesn't rise to a criminal level, we won't be  
2 accepting any charges. I looked over and I pointed  
3 right at him and said captain, if you don't accept  
4 these charges, I'm going to Weehawken and if  
5 Weehawken doesn't accept them, I'm going to the  
6 state police.

7 Q. And what did he say in response?

8 A. Then they all Sergeant Kellerhar, [sic]  
9 Lieutenant De Martino [sic] was there, they were all  
10 telling me, you don't go to the police, you don't go  
11 to the police -- no, yeah, you don't go the police,  
12 you go to the court, you go to the court. Yeah,  
13 sure I was a deputy court administrator, you go to  
14 the police, I know where you go. So anyway, then  
15 they had my writing down this statement with  
16 Flemming which I thought was putting in a police  
17 report, turns out it was only an incident report.  
18 They had some female cop come sit over here who I  
19 never said three words to or spoke, Harrington [sic]  
20 was her name and she just sat there and I kept  
21 making mistakes on this because I was shaken and  
22 nervous and everything and I kept ripping them up  
23 and starting again. And then there like Jerry comes  
24 down and they're all hanging in the doorway and  
25 staring at me talking about me, they're like have

1 you to come up stairs for this meeting, you have to  
2 come up stairs for this meeting. So Flemming says  
3 Charlene it's okay, you go upstairs for the meeting  
4 and then you come back downstairs and we'll do this  
5 then. I go upstairs and basically they give me this  
6 piece of paper that says all kinds of things, they  
7 changed all my work responsibilities, I'm not  
8 allowed to email, I'm not allowed to talk to  
9 people, I mean it was bizarre what they wrote and to  
10 me it was more retaliation and abuse. So they had  
11 me so upset at one point that I was ready to throw  
12 up, then I ran out of the room and went the ladies  
13 room and threw up. And then I come back in and  
14 Michelle Corosis [sic] stops me and says come in,  
15 come in my office, I said I can't, I said I don't  
16 know what the heck they're doing in there and I was  
17 so upset. So I went back in and I said are you  
18 done, and they said they were done. I went  
19 downstairs to the police to Sergeant Flemming and I  
20 started writing again and as I was sitting there  
21 writing, my hands started tingling and started  
22 swelling up over here and I said to Flemming, look,  
23 I don't know what is going on so I called PA medical  
24 --

25 Q. Just so we're clear, it's your left hand

1     you're referring to?

2           A.     Yeah. I showed Flemming he sees it and  
3     everything so I called PA medical, I called PATC PA  
4     medical where Madonna and them are but they were out  
5     to lunch because I decided I needed to have somebody  
6     look at this in PA medical so --

7           Q.     Lets slowdown, I'll give you a chance to  
8     keep going. So you called PA medical on the New  
9     Jersey side?

10          A.     Journal Square -- not Journal Square,  
11     PATC.

12          Q.     And there was nobody there?

13          A.     Nobody answered, I left a voicemail.

14          Q.     And then after that, did you call PA  
15     medical on the New York side?

16          A.     Oh, no.

17          Q.     What happened next?

18          A.     I go upstairs to tell Jerry I'm going to  
19     PA medical and he ordered me to PA medical to go see  
20     that contract guy, Novich again but I was already  
21     going on my own account to have my hand looked at in  
22     PATC.

23          Q.     Right but --

24          A.     I didn't make my plan to go to Park  
25     Avenue, no, that was them forcing me again. And now

1 A. No, I don't remember.

2 Q. Were there more than one?

3 A. I have no idea.

4 Q. But you do at least remember seeing one  
5 with a curtain around it, correct?

6 A. Well, the curtain wasn't around it, the  
7 was right here. So there was a curtain nothing was  
8 closed off, the curtain was there, the curtain was  
9 wide open.

10 Q. And who was the first person you saw when  
11 you went into that area outside of the reception  
12 area?

13 A. I have no idea.

14 Q. Do you recall meeting with a doctor?

15 A. Yeah, Dr. Kerlegrand.

16 Q. Did you speak with anyone from OMS before  
17 you spoke with Dr. Kerlegrand?

18 A. Maybe I'm not sure, if they asked me  
19 questions, I don't know.

20 Q. When you met with Dr. Kerlegrand did you  
21 -- who spoke first, did you talk to her first --

22 A. I don't know.

23 Q. Please let me finish, did you speak to her  
24 first or did she speak to you first?

25 A. I don't recall.



1 Q. What do you recall when speaking to Dr.  
2 Kerlegrand?

3 A. Well, I recall she asked what happened, I  
4 told her Diannae Ehler assaulted me. I told her how  
5 I was assaulted and I told her that my hand was  
6 tingling and swelling and showed her my hand.

7 Q. Did Dr. Kerlegrand tell you if she knew  
8 that you were coming or not?

9 A. Not that I recall, I don't know. I'm not  
10 saying she didn't, I'm not saying she did, is my  
11 answer, I have no recollection.

12 Q. Where were you showing your hand to Dr.  
13 Kerlegrand in the medical office?

14 A. In the medical office.

15 Q. But where in the medical office?

16 A. In the office, what do you mean where, we  
17 were in the office, the doorway was way over there  
18 we were in the office.

19 Q. Lets slow it down and sort of go through  
20 it step by step. When you first go into the office  
21 what is the first thing you see?

22 A. I was there all of once, and I had never  
23 been back.

24 Q. Ms. Talarico, if you do not remember, say  
25 you don't remember?

1 Q. And so you don't -- was this area that you  
2 were seated in a chair separate and apart from the  
3 rest of the medical office?

4 A. No, it's right there, here's the curtain  
5 right here, I can touch it.

6 Q. So there was no door that you saw?

7 A. I'm not saying that, I don't know, I don't  
8 recall.

9 Q. Approximately how long were you seated in  
10 the chair talking to Dr. Kerlegrand for?

11 A. I have no idea.

12 Q. A couple of minutes, half-hour?

13 A. I have no idea.

14 Q. An hour?

15 A. I have no -- I doubt it an hour because  
16 then she had me get up and she did all of her  
17 examination and do this and do that and let me see  
18 your hand and do this and do that so, no, because  
19 remember I also had to go see that other guy.

20 Q. Novich?

21 A. Yes.

22 Q. Did you see Novich before or after you  
23 spoke to Dr. Kerlegrand?

24 A. I want to say after, or maybe in between,  
25 I'm not sure. I'm pretty sure I saw Kerlegrand

1 first I just don't know if I saw Kerlegrand again  
2 after it, you know what I mean?

3 Q. Where you were with Dr. Kerlegrand seated  
4 in that chair, could other people walking by see  
5 what was going on?

6 A. Well, the nurses were there you know, Mary  
7 Burke or whatever they could see and if somebody was  
8 allowed into medical, I don't know, I guess because  
9 they didn't have the curtains closed around me so I  
10 guess they could see them, I don't know.

11 MR. SOTO: I just want to raise an  
12 objection, she obviously answered it.

13 Q. What did Dr. Kerlegrand ask you to do for  
14 the examination?

15 A. Oh, she was having me doing things with my  
16 hands, with my hands out, touching my nose going --  
17 that's the stuff I remember, I couldn't tell you  
18 everything because I don't remember all.

19 Q. Did she give any x-rays?

20 A. Yeah, they took x-rays, they took x-rays,  
21 yes, and they took x-rays.

22 Q. And where did those x-rays -- where were  
23 they taken?

24 A. There, wherever they take them, they took  
25 me somewhere.

1 Q. But that's in a different area than --

2 A. In different room, yeah.

3 Q. And approximately how long -- withdrawn --  
4 did they take you for x-rays after Dr. Kerlegrand  
5 was performing the examination on you?

6 A. Yes, I'm pretty sure, I'm pretty sure.

7 Q. And after Kerlegrand looked at your hand  
8 and asked you to move your hand around, that's when  
9 they took you for x-rays?

10 A. I don't recall whether when I saw Novich  
11 when I got the x-rays, I know they took x-rays, I  
12 know I saw Novich, I know I saw Dr. Kerlegrand, I  
13 know they bandaged my hand, I don't know.

14 Q. After Dr. Kerlegrand looked at your hand,  
15 was she the one who took you to x-ray machine?

16 A. I don't know.

17 Q. How far away from that area by the seat  
18 that you were telling us about is the x-ray machine?

19 A. I don't know.

20 Q. But it is presumably in another room,  
21 correct?

22 A. I believe it's in another room, I'm pretty  
23 sure it's in another room.

24 Q. Do you remember how to get to the --

25 A. Absolutely not, it's like a maze in there.

1 Q. And was Mary Burke there when Dr.  
2 Kerlegrand was looking at your hand?

3 A. She was in and out.

4 Q. Do you recall what Dr. Kerlegrand said to  
5 you if anything when she was looking at your hand?

6 A. I don't recall.

7 Q. Did Dr. Kerlegrand or Mary Burke tell you  
8 that they were going to give you x-rays?

9 A. I don't know who said I was getting an  
10 x-ray, they took me to x-ray, I did what they told  
11 me.

12 Q. And after they took the x-rays, did you  
13 stay in that -- withdrawn -- after the x-rays were  
14 taken, did they bring you back to the same area with  
15 the seat or did you stay near the x-ray machine?

16 A. I have no idea.

17 Q. Did they tell you the results of the  
18 x-rays?

19 A. I don't recall.

20 Q. Did they look at any or examine any other  
21 parts of your body other than your hand?

22 A. I don't know think so, I mean like, my  
23 arms and stuff she touched and had me do things but  
24 that's all hand related.

25 Q. And when they looked at your hand, you

1     were fully clothed, correct?

2             A.     Yes.

3             Q.     They did not ask you to undress or to put  
4     on a gown.

5             A.     Thank God they didn't.

6             Q.     Did you see any cameras or recording  
7     devices in the medical office when were you there  
8     that day?

9             A.     Absolutely not.

10            Q.     After you got your x-rays, where did you  
11     go?

12            A.     I'm not sure the order of what happened,  
13     remember, I don't know when I saw Novich but I know  
14     I saw Novich before I left. I know they bandaged my  
15     hand before I left, I don't know the order, I don't  
16     recall.

17            Q.     And where was Novich office in relation to  
18     Dr. Kerlegrand was looking at your hand?

19            A.     He's on this side you go in these doors  
20     and she's on that side.

21            Q.     So it's a separate office?

22            A.     Well, like I said, it's a maze there's  
23     office all around, but it's a maze. She's over  
24     there, the doctors office is are over there, and  
25     there's all offices up there and offices there and

1 point in time.

2

3

4 Q. Just to go back just for a second, I know  
5 you mentioned when you were in the medical office  
6 not on Dr. Novich's side but Dr. Kerlegrand side,  
7 you said that Mary Burke was there, correct?

8 A. She was in the room when I was being  
9 examined, I'm pretty sure.

10 Q. And she's a nurse with OMS, is that  
11 correct?

12 A. Right, and there was some other nurse  
13 there or something, I don't know who she was.

14 Q. Well, A, you don't remember who the other  
15 nurse was?

16 A. No.

17 Q. Do you remember where that other nurse was  
18 located?

19 A. No, they were in and out people, were in  
20 and out they were in and out.

21 Q. Do you remember what the other nurse  
22 looked like?

23 A. No, but she's on the video, she's in the  
24 video.

25 Q. As far as you can recall, you saw two

1 give him the opportunity.

2 Q. And who is the chief that you spoken to?

3 THE WITNESS: Do I have to tell him that?

4 MR. SOTO: Yes.

5 A. Christopher Trasillo [sic] now the Chief  
6 of New Jersey Transit prior he was the Chief at the  
7 Port Authority. I went back to the Lincoln Tunnel,  
8 I went upstairs my hand was all bandaged to give  
9 them my slip, to give Zanobia my slip saying I was  
10 out of work. Jerry came out and he turned white  
11 when he saw my hand all bandaged. I went downstairs  
12 and I got in my car because remember now the  
13 lieutenants and the sergeants they were screaming at  
14 me, don't go to the police, don't go to the police.  
15 I got in my car and I called the Weehawken Police  
16 Department and Sergeant Johnson answered the phone  
17 and I said, I need to press criminal charges, I was  
18 assaulted at work, I work at the Lincoln Tunnel or  
19 something to this effect, and what should I do, he  
20 said dear, you come right up here to the police  
21 department which is what I did.

22 Q. And was that the same day?

23 A. Absolutely.

24 Q. Did there come a time when you learned  
25 there this was something procedurally incorrect



1 away when you got back?

2 A. No, no, it was hours of discs, hours, it's  
3 everything I did that day.

4 Q. When did you sitdown and look at the  
5 discs?

6 A. It was some night I was sitting in my  
7 living room and looking at them. Off the top of my  
8 head, I don't have the exact date, I know you do. I  
9 know because we had to have the exact date or  
10 approximate date before we put the lawsuit in, the  
11 approximate date, I don't know off the top of my  
12 head.

13 Q. If I said that February 2, 2017 would that  
14 sound about right?

15 A. I think that might be near, yeah.

16 Q. And again, this was in your home?

17 A. Yes, I was by myself in my -- well, the  
18 dog and I.

19 Q. And what do you recall doing?

20 A. I couldn't believe it. I couldn't believe  
21 it. First of all, I was shocked that everywhere I  
22 went in the elevators and everything they had me on  
23 tape which I never knew. Especially after I know  
24 the terrible things and Jerry was trying to say I  
25 was acting crazy that day when it's clear on tape

1 that I was calm as a cucumber. You know, other than  
2 maybe being a little upset but I wasn't acting like  
3 he was talking about. Then all of a sudden I see my  
4 entire medical examination with Dr. Kerlegrand, the  
5 entire thing. I couldn't even wrap my head around  
6 it, I called my girlfriend we must have been on the  
7 phone for two or three hours, I was like shocked.  
8 Like bad enough all the rotten things the Port  
9 Authority did to me but now HIPPA violations.  
10 They've destroyed my reputation and everything else  
11 and now they're filming my medical, I still can't  
12 wrap my head around it. Like do they know no  
13 bounds, does justice and truth and honesty mean  
14 nothing?

15 Q. And the examination that you viewed on the  
16 recording, this is what you were referring to before  
17 when Dr. Kerlegrand was asking to move your hands  
18 around?

19 A. It was my entire medical examination with  
20 Dr. Kerlegrand. Every single thing that Dr.  
21 Kerlegrand is right there on the tape and me.

22 Q. And obviously the recordings speak for  
23 themselves but when you say that everything in the  
24 examine, you mean when she was asking you to move  
25 your hands?